

D.T.E. 05-86-F

**Comments on New England Gas Company Arrearage Management Plan
filed by New England Gas Company**

I, Elizabeth Berube as Fuel Assistance Director of Citizens For Citizens, Inc., the anti-poverty agency that services the fuel assistance clients in the Greater Fall River and Taunton area would like to comment on the New England Gas arrearage management plan submitted by New England Gas Company.

Due to our wide ranged service area, I anticipate assisting four (4) utility companies administer the mandated arrearage management plans. After reviewing the individual plans submitted by NSTAR Gas and Electric, National Grid, Bay State Gas and New England Gas, all of which are part of our service territory, I am very disappointed with the plan submitted specifically by New England Gas. Citizens For Citizens, Inc. services approximately 7,800 New England Gas heating customers and disburses millions of dollars each year in fuel assistance payments. Citizens For Citizens, Inc. has the second highest number of fuel assistance clients in the entire state. Of our 13,000 eligible households, sixty percent are customers of New England Gas Company.

Comparing the plans, with the other utility companies within our service area, New England Gas is requiring a 25% down payment requirement as well as an extremely low arrears credit – the lowest of all companies. This \$150 arrears credit does not seem to be a realistically fair policy in light of today's high heating bills nor does the 25% down payment requirement seem to be a fair request. I am anticipating arrears after this winter to be a minimum of \$500-\$1,000.

CFC is hoping to work hand in hand with New England Gas managing an arrearage plan that will demonstrate some type of success, however, with an apparent lack of commitment on the gas company side, I feel very disheartened on behalf of my clients. As part of CFC's

commitment, we would be glad to follow up on behalf of those clients that have broken their arrearage plan and try to steer them back on track. The goal of teaching customers to make payments each month would seem to be beneficial to all parties involved. The gas company filing shows no type of reimbursement to CFC for administrative costs involved in getting clients on the mandated arrearage program.

I am looking to DTE to analyze the filing submitted by New England Gas with those filed by the other companies and share recommendations on making the goals of the arrearage management program become realistic and worthwhile.

Thank you for your consideration, I remain. If these comments do not reach you by Tuesday, January 17, 2006, I would kindly request a leave to file these comments late.

Sincerely,

Elizabeth Berube
Fuel Director

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